

**DEPARTMENT OF COMMERCE AND
ECONOMIC DEVELOPMENT**

ALASKA PUBLIC UTILITIES COMMISSION

RECEIVED

AUG 9 1996

FCC MAIL ROOM

TONY KNOWLES, GOVERNOR

1016 WEST SIXTH AVENUE, SUITE 400
ANCHORAGE, ALASKA 99501-1963
PHONE: (907) 276-6222
FAX: (907) 276-0160
TTY: (907) 276-4533

DOCKET FILE COPY ORIGINAL

August 8, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 96-45

Dear Mr. Caton:

Enclosed are an original and four copies of the Comments of the Alaska Public Utilities Commission in response to the Public Notice (DA96-1094) released July 10, 1996, by the Common Carrier Bureau seeking comments on proxy models.

Sincerely,

ALASKA PUBLIC UTILITIES COMMISSION


Don Schröer, Chairman

No. of Copies rec'd
List A B C D E

0+4

DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)

RECEIVED
AUG 9 1996
FCC MAIL ROOM

Comments of the
Alaska Public Utilities Commission

Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, Alaska 99501
(907) 276-6222; TTY (907) 276-4533

Date: August 8, 1996

Don Schröer, Chairman
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 300
Anchorage, Alaska 99501

SUMMARY

The revised version of the Benchmark Cost Model (BCM2) fails to accurately represent Alaska costs, and if applied to Alaska, could compromise the provision of universal service.

The existing proxy models do not adequately represent the costs for small rural companies. As a result, if a proxy based system is adopted, then a bifurcated approach should be implemented to allow rural companies the use of book costs instead of proxy costs. Rural carriers should begin to transition off of a bifurcated approach, if at all, only after it can be quantifiably demonstrated that the new system reflects the cost characteristics of the small companies, and companies have the ability to seek waiver. A streamlined, well documented, waiver process must be included in any proxy mechanism to accommodate those companies with legitimate high costs that are not contemplated under the model. Applications for waiver should be accepted for review whenever use of the proxy model would lead to a set amount of increase (e.g., \$2) in the monthly local phone bill.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
AUG 9 1996
FCC MAIL ROOM

In the Matter of)
)
Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

Comments of the
Alaska Public Utilities Commission

The Alaska Public Utilities Commission (APUC) appreciates the opportunity to file comments in response to the July 10, 1996, Public Notice (DA 96-1094) on universal service in CC Docket 96-45.

1. A bifurcated approach should be implemented to allow the Use of book costs (instead of proxy costs) for rural companies

If a proxy model is adopted, then a bifurcated approach should be implemented to allow rural companies to obtain support based on actual book costs instead of proxy costs. First, all of the proxy models to date are based to a significant degree on the cost characteristics of large local exchange companies with extensive operations in urban areas. As a result, it cannot be concluded that any of the models truly represents the costs for

1 an efficient small rural company. For example, none of the proxy
2 models adequately take into consideration that small rural
3 companies may have extremely low economies of scale or may not be
4 able to negotiate the cost discounts available to the larger,
5 urban-based local carriers. Furthermore, no correlation has ever
6 been shown to exist between the outputs of any of the proxy models
7 and actual construction costs of existing companies. The APUC
8 therefore supports the concept that small rural companies should
9 remain under some form of the existing high cost support system
10 until pilot projects can be run of any new system and it can be
11 quantitatively demonstrated that the new system will lead to
12 reasonable results when applied to small rural companies.

13
14
15
16 **2. Any transition of rural carriers to a proxy system requires**
17 **careful review.**

18 Rural carriers should begin to transition off of a bifurcated
19 approach, if at all, only after a) it can be quantitatively
20 demonstrated that the new system reasonably reflects the cost
21 characteristics of the small companies involved, and b)
22 streamlined procedures are in place to accommodate requests for
23 waiver to use alternative methods (e.g., alternate proxy or a cost
24 based system).

1 3. Existing proxy models fail to adequately address Alaska high
2 cost issues.

3 As has been documented in the APUC's Comments filed on
4 October 9, 1995, in CC Docket No. 80-286, Alaska's high costs are
5 the result of several conditions including:

6 a) Terrain, slope, and surface characteristics such as
7 mountains, glaciers, rivers, permafrost, ice effects, avalanche
8 susceptibility, and the physical placement of the plant to
9 accommodate these factors;

10 b) Harsh climate;

11 c) Lack of a road system to most of the state's locations
12 and heavy reliance on airplanes and sea barge to transport
13 equipment and access the majority of rural communities in Alaska;

14 d) Limitations placed on surface transportation and the
15 construction season due to Arctic conditions;

16 e) Limited economies of scale (e.g., service to exchanges
17 of under 200 lines); and

18 f) High labor costs.

19 None of the proxy models filed to date reflect any of the
20 above factors. As a results, the APUC does not believe that any
21 of the existing proxy models are appropriate to Alaska.
22
23
24
25
26

1 In addition, given that local competition does not exist in
2 rural Alaska at this time, it would seem premature to adopt a
3 competitive bidding based model for rural Alaska. The APUC
4 therefore proposes that Alaskan local exchange carriers should be
5 allowed to remain on some form of the existing cost-based system
6 at this time, until it can be quantitatively documented that the
7 new proxy model, when applied to Alaska, leads to no harm and does
8 not produce unwarranted reductions in high cost support.
9

10
11 Alaska is highly reliant on universal service support to
12 maintain rates at reasonable levels. Without support, local rates
13 in Alaska could increase by \$20 to \$80 per month in some
14 locations. As support to Alaska currently represents only 4% of
15 the existing Universal Service Fund and weighted Dial Equipment
16 Minutes support systems, the APUC believes that maintaining
17 Alaska on an actual cost system will not be unduly burdensome.
18

19 The existing proxy models should not be applied to Alaska as
20 they fail to adequately represent Alaska costs. For example,
21 several of the models currently under consideration are based on
22 the Benchmark Cost Model (BCM). The APUC has reviewed the updated
23 version of the BCM (BCM2) and concluded that there is a serious
24 flaw in the results for Alaska and possibly for other states.
25
26

1 The APUC performed a correlation test between existing high cost
2 support provided under the Universal Service Fund (USF) as
3 reported under the May 1996, Monitoring Report in CC Docket No.
4 87-339 and the support that would be provided to each state under
5 BCM2 given a \$20, \$50, and \$80 revenue benchmark. This
6 correlation indicated that under BCM2, Alaska will receive an
7 unusually low (in fact the lowest) amount of support, relative to
8 existing levels of high cost support, compared to all other
9 states.¹

12 To illustrate this point, local exchange companies in the
13 state of Nevada have on average the lowest unseparated non-
14 traffic-sensitive NTS revenue requirements per loop in the country
15 (\$186/loop) and obtain about \$3 million in USF support. Under
16 BCM2, these carriers would receive \$84 million in support, 28
17 times the existing USF, at the \$20 benchmark level. Alaska, with
18 one of the highest historical per loop costs (\$381.62) would
19 receive only 1.8 times its existing USF support (\$31 million
20 compared to \$58 million). At the \$50 benchmark, Alaska is the
21 only state that would receive less under BCM2 (68%) than under the

25 ³APUC's analysis was run assuming a \$20, \$50, and \$80 revenue benchmark.
26 For the \$20, and \$50 benchmark, Alaska has the lowest BCM2 support to
historical loop support ratio. For the \$80 benchmark, 75% of the states have
a higher BCM2 support to historical support ratio than Alaska.

1 existing USF, with many other states receiving over 10 times their
2 existing levels of support. At the \$80 benchmark, Alaska would
3 receive 34% of its existing USF while carriers in states with
4 low average loop cost such as Nevada and Pennsylvania would obtain
5 481% and 829%, respectively, of their existing levels of support.
6 At the \$80 benchmark, Alaskans in rural areas could see, on
7 average, local phone rates increase by over \$100 per year.² See
8 Attachment A. Furthermore, under the existing system Alaska
9 receives the fifth highest amount of USF support while under BCM2
10 at the \$20 benchmark level, Alaska would receive the sixth lowest
11 amount of support.
12

13
14 These figures demonstrate that there is something seriously
15 wrong with BCM2 and likely any model reliant on the BCM
16 foundation. As a result, application of a BCM based model should
17 not be required in Alaska.
18

19 As a last point, the APUC notes that under BCM2 many areas
20 of Alaska where local exchanges exist are not included in the cost
21 analysis (see Attachment B). For example, Deadhorse/Prudhoe Bay
22 does not appear to be incorporated in the cost model.
23
24

25
26 ²Assuming existing levels of USF support (\$31 million) are reduced to the
BCM2 level (\$11 million at the \$80 benchmark), with approximately 180,000 rural
access lines affected.

1
2 4. Companies should have recourse to seek waiver if a proxy system
3 is adopted.

4 The proxy models filed in this proceeding consider only a
5 limited number of factors that may lead to high costs. There will
6 be instances where a company will experience high costs due to
7 conditions not adequately represented under the model. Some
8 companies may also have a one time occurrence of high costs (e.g.,
9 damage due to earthquake, flood, or storm) that cannot be
10 predicted by any proxy model. In both of these circumstances, the
11 company involved should have an opportunity to apply for and
12 receive waiver to allow alternative treatment. Any such waiver
13 process should be streamlined and clearly described such that
14 companies are aware of what documentation need be provided and
15 under what conditions waiver may be granted. Applications for
16 waiver should be accepted whenever use of the proxy model would
17 lead to an increase in the monthly local rate that is greater than
18 a set amount (e.g., \$2). Setting a limit of this kind may prevent
19 rate shock and reduce subscriber losses.
20
21
22

23 **Conclusion**

24 The APUC requests that any changes to the existing high cost
25 support system be carefully considered and quantitatively reviewed
26

1 prior to applying the system to small rural companies. Many of
2 the existing proxy proposals offered to date in this proceeding
3 are clearly inadequate to address high cost issues in rural areas
4 of the nation.
5

6
7 RESPECTFULLY SUBMITTED this 8th day of August, 1996.

8 Sincerely,

9
10 

11 By: Commissioner Don Schröer
12 Chairman of the Alaska Public
13 Utilities Commission
14 1016 West Sixth Avenue, Suite 300
Anchorage, Alaska 99501
1-907-276-6222

15 cc: William F. Caton
16 Acting Secretary
17 Federal Communications Commission

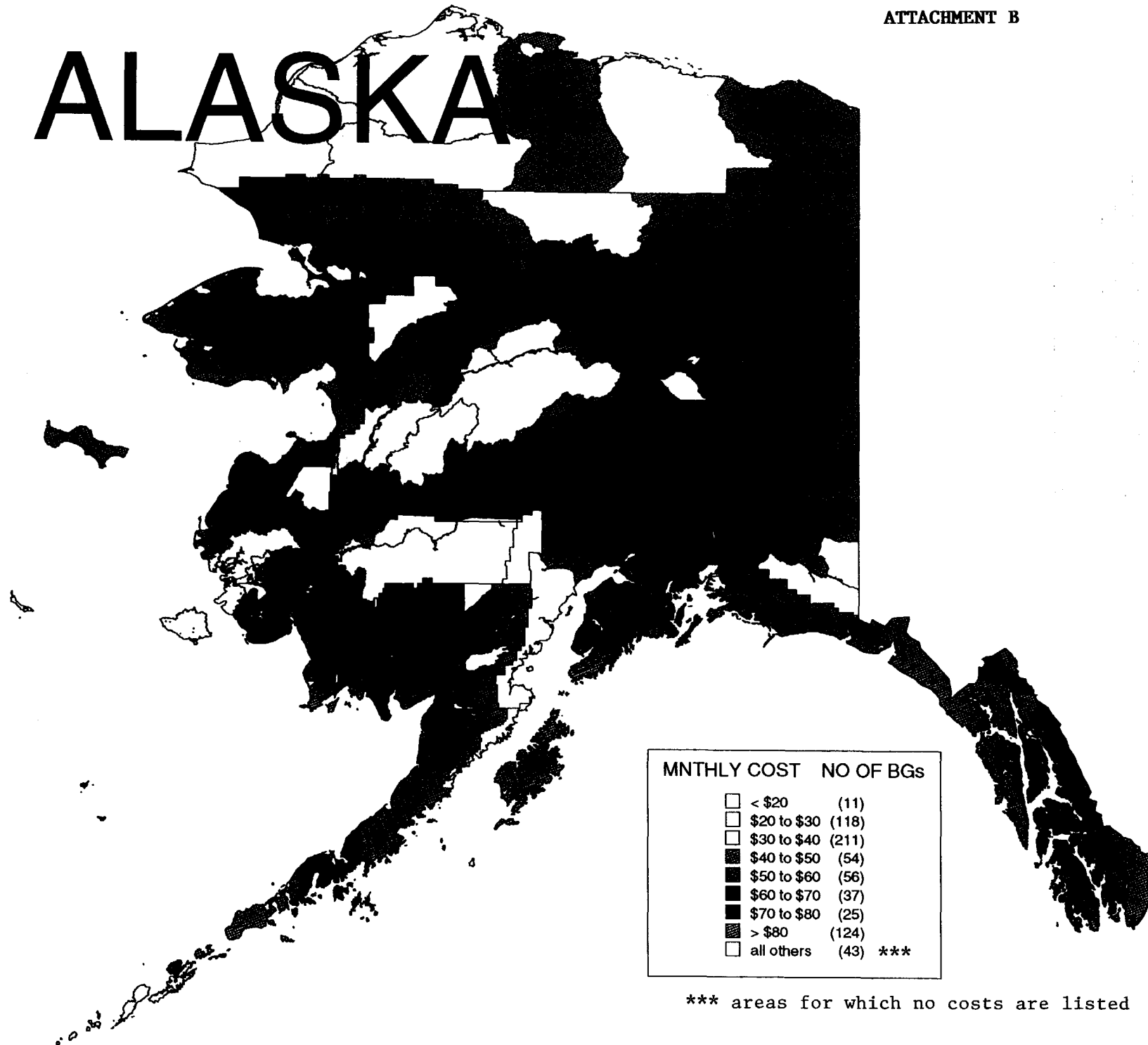
18 Attached List
19
20
21
22
23
24
25
26

STATE	UNDER THE EXISTING USF SYSTEM				UNDER BCM2				Comparison of Existing Support from Universal Service Fund to BCM Support			
	UNSEPARATED NTS REVENUE REQUIREMENT (Millions)	UNSEP. NTS REV REQ PER LOOP	UNIVERSAL SERVICE FUND PAYMENTS FOR 1996 (Millions)	% of TOTAL Fund	BCM2 Aggregated Support (Support in Millions) Given various Benchmarks:			BCM2 Benchmark Cost Total	Benchmark Revenue Level			BCM2 Cost/ URR Cost
					\$20	\$50	\$80		\$20	\$50	\$80	
ALABAMA	\$579	\$264.46	\$22	2.99%	\$349	\$48	\$2	\$1,054	1587.73%	217.77%	9.11%	181.93%
ALASKA	\$132	\$381.62	\$31	4.22%	\$58	\$21	\$11	\$1,777	185.48%	67.97%	34.49%	134.01%
ARIZONA	\$642	\$279.60	\$16	2.13%	\$243	\$65	\$32	\$899	1555.12%	415.32%	203.44%	140.11%
ARKANSAS	\$411	\$337.80	\$38	5.18%	\$266	\$68	\$10	\$697	697.96%	178.56%	24.96%	169.59%
CALIFORNIA	\$4,015	\$206.51	\$46	6.24%	\$883	\$84	\$27	\$5,953	1926.50%	182.92%	59.92%	148.26%
COLORADO	\$592	\$260.35	\$4	0.55%	\$217	\$51	\$21	\$868	5356.04%	1251.06%	508.92%	146.55%
CONNECTICUT	\$460	\$243.90	\$0	0.00%	\$167	\$15	\$0	\$753				163.56%
DELAWARE	\$100	\$213.93	\$0	0.00%	\$35	\$2	\$0	\$167				167.25%
DISTRICT OF COLUMBIA	\$65	\$77.03	\$0	0.00%	\$4	\$0	\$0	\$189				288.88%
FLORIDA	\$2,713	\$301.25	\$25	3.34%	\$692	\$46	\$6	\$3,171	2817.52%	187.60%	25.62%	116.90%
GEORGIA	\$1,245	\$310.56	\$27	3.73%	\$442	\$54	\$3	\$1,654	1612.51%	195.22%	9.75%	132.85%
HAWAII	\$181	\$277.13	\$0	0.00%	\$51	\$8	\$2	\$234				129.41%
IDAHO	\$182	\$310.28	\$17	2.37%	\$101	\$35	\$15	\$289	579.45%	201.38%	83.45%	158.92%
ILLINOIS	\$1,197	\$167.35	\$3	0.42%	\$528	\$67	\$5	\$2,636	17305.60%	2194.99%	155.29%	220.31%
INDIANA	\$713	\$231.16	\$2	0.29%	\$369	\$39	\$0	\$1,350	17075.19%	1819.56%	20.42%	189.37%
IOWA	\$294	\$201.79	\$4	0.48%	\$254	\$57	\$3	\$754	7133.09%	1612.28%	70.22%	256.49%
KANSAS	\$402	\$284.09	\$27	3.63%	\$217	\$65	\$23	\$675	812.36%	244.53%	86.64%	167.99%
KENTUCKY	\$550	\$294.30	\$10	1.38%	\$324	\$47	\$1	\$958	3197.85%	467.14%	12.74%	174.30%
LOUISIANA	\$689	\$311.19	\$33	4.52%	\$303	\$44	\$3	\$1,000	912.57%	132.00%	9.64%	145.18%
MAINE	\$242	\$337.46	\$7	1.00%	\$166	\$55	\$13	\$416	2266.83%	749.96%	172.63%	172.24%
MARYLAND	\$666	\$213.86	\$0	0.00%	\$169	\$8	\$1	\$1,030				154.57%
MASSACHUSETTS	\$866	\$225.25	\$0	0.00%	\$233	\$16	\$1	\$1,305				150.63%
MICHIGAN	\$1,265	\$226.82	\$12	1.58%	\$587	\$61	\$6	\$2,297	5051.82%	522.41%	54.17%	181.56%
MICRONESIA	\$10	\$681.60	\$4	0.58%								
MINNESOTA	\$587	\$228.56	\$8	1.09%	\$329	\$80	\$13	\$1,121	4120.28%	998.78%	160.21%	190.92%
MISSISSIPPI	\$418	\$346.53	\$14	1.87%	\$254	\$46	\$3	\$687	1844.68%	334.21%	18.45%	164.39%
MISSOURI	\$742	\$252.28	\$46	6.29%	\$424	\$116	\$25	\$1,346	917.03%	252.03%	54.38%	181.31%
MONTANA	\$148	\$323.08	\$12	1.64%	\$99	\$43	\$20	\$262	823.64%	352.17%	164.02%	176.54%
NEBRASKA	\$197	\$216.54	\$5	0.66%	\$149	\$50	\$15	\$451	3078.47%	1037.27%	312.88%	228.72%
NEVADA	\$178	\$186.35	\$3	0.41%	\$84	\$26	\$14	\$342	2798.94%	878.47%	480.87%	191.68%
NEW HAMPSHIRE	\$232	\$334.63	\$5	0.70%	\$106	\$23	\$3	\$328	2077.07%	443.64%	56.36%	141.57%
NEW JERSEY	\$1,104	\$202.66	\$2	0.22%	\$234	\$5	\$0	\$1,633	14478.01%	316.49%	22.41%	147.84%
NEW MEXICO	\$252	\$313.07	\$16	2.21%	\$136	\$51	\$24	\$394	837.29%	311.08%	146.68%	156.04%
NEW YORK	\$3,057	\$263.81	\$12	1.66%	\$660	\$90	\$18	\$3,658	5402.45%	738.80%	147.91%	119.69%
NORTH CAROLINA	\$1,201	\$301.22	\$22	2.98%	\$530	\$56	\$2	\$1,750	2421.80%	253.76%	7.87%	145.70%
NORTH DAKOTA	\$100	\$263.48	\$4	0.52%	\$92	\$47	\$23	\$223	2414.15%	1226.08%	612.52%	222.99%
OHIO	\$1,366	\$227.32	\$2	0.29%	\$615	\$51	\$0	\$2,510	28456.47%	2360.65%	11.44%	183.70%
OKLAHOMA	\$478	\$275.97	\$27	3.68%	\$268	\$61	\$12	\$834	989.65%	223.96%	45.60%	174.40%
OREGON	\$483	\$276.03	\$10	1.34%	\$217	\$52	\$19	\$758	2205.14%	525.55%	195.18%	158.80%
PENNSYLVANIA	\$1,547	\$213.87	\$1	0.13%	\$613	\$85	\$8	\$2,739	62756.79%	8746.56%	828.62%	177.06%
PUERTO RICO	\$412	\$356.78	\$30	4.02%								
RHODE ISLAND	\$131	\$229.24	\$0	0.00%	\$44	\$3	\$0	\$216				165.10%
SOUTH CAROLINA	\$645	\$345.84	\$20	2.72%	\$279	\$36	\$1	\$882	1398.53%	182.61%	4.75%	136.73%
SOUTH DAKOTA	\$92	\$244.80	\$2	0.32%	\$94	\$39	\$15	\$233	4021.23%	1688.42%	661.40%	254.48%
TENNESSEE	\$785	\$268.81	\$3	0.46%	\$391	\$50	\$4	\$1,274	11536.68%	1475.97%	117.64%	162.33%
TEXAS	\$2,668	\$264.22	\$89	12.13%	\$966	\$163	\$40	\$3,895	1083.24%	183.19%	44.92%	145.96%
UTAH	\$192	\$208.74	\$3	0.37%	\$90	\$24	\$12	\$355	3311.51%	890.28%	448.32%	184.43%
VERMONT	\$135	\$383.16	\$5	0.70%	\$72	\$23	\$4	\$192	1407.59%	445.10%	80.10%	142.01%
VIRGIN ISLANDS	\$32	\$560.39	\$11	1.55%								
VIRGINIA	\$964	\$252.01	\$4	0.55%	\$377	\$41	\$2	\$1,545	9321.04%	1024.07%	48.93%	160.31%
WASHINGTON	\$727	\$235.03	\$16	2.16%	\$279	\$48	\$15	\$1,162	1762.76%	305.09%	96.64%	159.82%
WEST VIRGINIA	\$318	\$361.39	\$20	2.67%	\$214	\$58	\$10	\$541	1093.69%	298.45%	51.06%	170.05%
WISCONSIN	\$643	\$219.80	\$7	1.02%	\$343	\$56	\$6	\$1,249	4599.07%	745.05%	82.92%	194.40%
WYOMING	\$104	\$393.78	\$7	1.00%	\$50	\$21	\$12	\$145	682.37%	289.79%	161.04%	139.61%
INDUSTRY TOTAL:	\$38,152		\$735	100.00%	\$14,665	\$2,400	\$506	\$59,252				

NTS: Non-Traffic-Sensitive
 URR: Unseparated NTS Revenue Requirement
 USF: Universal Service Fund

A: Actual total loop costs
 B: Costs/loop
 C: Existing loop support
 D: Percent support for each state
 E: Support under BCM2 at a \$20 benchmark
 F: Support under BCM2 at a \$50 benchmark
 G: Support under BCM2 at a \$80 benchmark
 H: Total costs under BCM2
 I: E/C
 J: F/C
 K: G/C
 L: H/A

ALASKA



STATE OF ALASKA

THE ALASKA PUBLIC UTILITIES COMMISSION

RECEIVED

AUG 9 1996

FCC MAIL ROOM

Before Commissioners:

Don Schröer, Chairman
Alyce A. Hanley
Dwight D. Ornquist
Tim Cook
Sam Cotten

Federal-State Joint Board)
On Universal Service)

CC Docket No. 96-45

CERTIFICATION OF MAILING

I, Linda L. Schwass, certify as follows:

I am an Administrative Clerk II in the offices of the Alaska
Public Utilities Commission, 1016 W. Sixth Avenue, Suite 400,
Anchorage, Alaska 99501.

On August 8, 1996, I mailed true and accurate copies with postage
thereon of:

COMMENTS OF ALASKA PUBLIC UTILITIES COMMISSION

CC 96-45

to the persons indicated on the attached service list.

DATED at Anchorage, Alaska, this 8th day of August, 1996.


Linda L. Schwass

SERVICE LIST
CC DOCKET 96-45

August 7, 1996
Page 1 of 6

RECEIVED

AUG 9 1996

FCC MAIL ROOM

International Transcription
Services
Room 640
1990 M Street, N.W.
Washington, DC 20036

Martha S. Hogerty
Public Counsel for the
State of Missouri
P. O. Box 7800
Harry S. Truman Building, Room 250
Jefferson City, MO 65102

Sam Loudenslager
Arkansas Public Service Commission
1000 Center Street
P. O. Box C-400
Little Rock, AR 72203

Brian Roberts
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Paul Rodgers, Esq.
General Counsel
Charles D. Gray, Esq.
Assistant General Counsel
NARUC
P. O. Box 684
Washington, DC 20044

Robert M. Halperin, Esq.
Attorney for the State of Alaska
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595

Michael A. McRae
D.C. Office of the People's Counsel
1133 15th Street, N.W., Suite 500
Washington, DC 20005

The Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
Room 844
1919 M Street, N.W.
Washington, DC 20554

SERVICE LIST (CONTINUED)
CC DOCKET 96-45

August 7, 1996
Page 2 of 6

Deborah A. Dupont
FCC Joint Board Staff Chair
Federal Communications Commission
Common Carrier Bureau - Accounting
& Audits Division
2000 L Street, N.W. - Room 257
Washington, DC 20036

Alex Belinfante
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Andrew Mulitz
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

Clara Kuehn
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

Gary Oddi
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

Jeanine Poltronieri
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

Jonathan Reel
Federal Communications Commission
Common Carrier Bureau - Accounting
and Audits Division
2000 L Street, N.W. - Room 257
Washington, DC 20036

Larry Povich
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

SERVICE LIST (CONTINUED)
CC DOCKET 96-45

August 7, 1996
Page 3 of 6

Mark Nadel
Federal Communications Commission
1919 M Street, N.W., Suite 257
Washington, DC 20554

Pamela Szymczak
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

Rafi Mohammed
Federal Communications Commission
Common Carrier Bureau - Accounting
and Audits Division
2000 L Street - Room 812
Washington, DC 20036

Regina M. Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
2000 L Street, N.W.
Washington, DC 20554

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W. - Room 814
Washington, DC 20554

The Honorable Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, N.W. - Room 832
Washington, DC 20554

Whiting Thayer
Federal Communications Commission
2000 L Street, N.W. Suite 812
Washington, DC 20036

William Howden
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, DC 20036

SERVICE LIST (CONTINUED)
CC DOCKET 96-45

August 7, 1996
Page 4 of 6

Gary Seigel
Federal Communications Commission
Common Carrier Bureau - Accounting
& Audits Division
2000 L Street, N.W. - Room 812
Washington, DC 20036

Mark Long
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

Barry Payne
Indiana Office of Consumer Counsel
100 North Senate Avenue, Room N501
Indianapolis, IN 46204-2208

The Honorable Julia Johnson
Commissioner
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Eileen Benner
Idaho Public Utilities Commission
P. O. Box 83720
Boise, ID 83720-0074

Sandra Makeeff
State Joint Board Staff Chair
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Joel B. Shifman, Esq.
Maine Public Utilities Commission
State House Station No. 18
242 State Street
Augusta, ME 04333-0018

SERVICE LIST (CONTINUED)
CC DOCKET 96-45

August 7, 1996
Page 5 of 6

Paul E. Pederson
State Staff Chair
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

The Honorable Kenneth McClure
Vice Chairman
Missouri Public Service Commission
301 West High Street, Suite 530
Jefferson City, MO 65102

Terry Monroe
New York Public Service Commission
Three Empire Plaza
Albany, NY 12223

Phillip F. McClelland
Pennsylvania Office of
Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Debra M. Kriete
Pennsylvania Public
Utilities Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Charles Bolle
South Dakota Public
Utilities Commission
State Capital, 500 East Capital
Avenue
Pierre, SD 57501-5070

The Honorable Laska Schoenfelder
Commissioner
South Dakota Public Utilities Comm.
State Capitol Building
Pierre, SD 57501-5070

John Katz
Director
State/Federal Relations
Special Counsel to the Governor
Office of the State of Alaska
444 North Capitol NW, Suite 526
Washington, DC 20001-1512

SERVICE LIST (CONTINUED)
CC DOCKET 96-45

August 7, 1996
Page 6 of 6

The Honorable Ted Stevens
United States Senate
706 Hart Building
Washington, DC 20510-0201

James Bradford Ramsay
National Association of Regulatory
Utility Commissioners
1102 ICC Building
Constitution Avenue & 12th St.,
N.W.
P. O. Box 684
Washington, DC 20044

The Honorable Sharon L. Nelson
Chairman
Washington Utilities and
Transportation Commission
Chandler Plaza Building
1300 South Evergreen Park Drive,
S.W.
Olympia, WA 98504-7250

Lee Palagy
Washington Utilities and
Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250